Annual Review of the Public Water System Supervision Program for the State of Mississippi

Fiscal Year 2021

October 1, 2020 - September 30, 2021

Report Date: June 27, 2022

Summary of State Drinking Water Program

Pursuant to 40 C.F.R. § 142.17, the U.S. Environmental Protection Agency Region 4 (EPA Region 4) conducted an end-of-year evaluation of the fiscal year (FY) 2021 Public Water System Supervision (PWSS) program administered by the Mississippi State Department of Health (MSDH). In FY 2021, MSDH regulated 1,180 active public water systems (PWSs) that collectively serve 3,177,191 customers. This water system inventory includes 1,027 community water systems (CWSs), 70 non-transient non-community water systems (NTNCWSs), and 83 transient non-community water systems (TNCWSs). Table 1 shows the EPA National Water Program Measures, targets, baseline data and the 2021 results for the EPA Region 4 and the State.

Table 1: EPA National Water Program Measures – Mississippi

EPA National Water Program Measures	What EPA Tracks	EPA National FY 2021 Target	Region 4 Baseline	Region 4 FY 2021 Target	Region 4 FY 2021 Result	State Baseline	State FY 2021 Result
By September 30, 2022, reduce the number of CWSs out of compliance with health-based standards to 2,700. Baseline is 3,600 as of 3rd Quarter 2017.	Number of CWSs out of compliance with health-based standards	3,402	318	258	195	22	32
By September 30, 2021, reduce the number of CWSs still in noncompliance with health-based standards since September 30, 2017. Baseline data is 1,048 as of 3rd Quarter 2020.	Number of CWSs still out of compliance with health-based standards	848	26	23	12	0	0
By September 30, 2022, reduce the number of CWSs out of compliance due to health-based violations of the Lead and Copper Rule (LCR) by 50 percent. Baseline is 308 as of FY 2017.	Number of CWSs out of compliance with LCR health-based violations	219	53	N/A	5	1	1

State Resources

The MSDH was awarded its FY 2021 PWSS allocation through a Direct Grant. MSDH FY 2021 PWSS grant allocation was $1,192,000. MSDH received $118,000 in PWSS Supplemental Grant funding for Per- and polyfluoroalkyl substances (PFAS) and emerging contaminants. MSDH used their funding to sample near known PFAS sources.

The Mississippi Drinking Water State Revolving Fund (DWSRF) included up to $2,171,040 in set asides for FY 2021. Set asides included $236,840 for Small Systems Technical Assistance; $750,000 for State Program Management and $1,184,200 for Local Assistance.

Status of Rule Adoption/Primacy

The EPA Region 4's Drinking Water Program has been working to reduce the backlog of primacy applications under review, and reduction of this backlog is one of the national measures for the program. The MSDH has adopted regulatory authority for all required federal PWSS Program rules promulgated through FY 2020, and the EPA has formally approved primacy applications submitted by MSDH for each of these rules.

Table 2: Status of Rule Adoption/Primacy

Rule	Date of Rule Adoption by State	Primacy Application Status
Administrative Penalty Authority	4/1/2000	Approved 8/1/2001
New PWS Definition	4/1/2000	Approved 8/1/2001
Consumer Confidence Report Rule	4/1/2000	Approved 8/1/2001
Interim Enhanced Surface Water Treatment Rule	12/16/2000	Approved 5/1/2003
Stage 1 Disinfectants and Disinfection Byproducts Rule	12/16/2000	Approved 5/1/2003
Lead and Copper Rule Minor Revisions	10/10/2001	Approved 7/1/2002
Public Notification Rule	5/4/2002	Approved 5/1/2003
Radionuclides Rule	12/9/2004	Approved 2/16/2006
Arsenic and Clarifications to Compliance and New Source Contaminants Monitoring Rule	12/9/2004	Approved 2/16/2006
Filter Backwash Recycling Rule	12/9/2004	Approved 2/16/2006
Long Term 1 Enhanced Surface Water Treatment Rule	7/24/2012	Approved 8/11/2014
Stage 2 Disinfectants and Disinfection Byproducts Rule	7/24/2012	Approved 8/11/2014
Long Term 2 Enhanced Surface Water Treatment Rule	7/24/2012	Approved 8/11/2014
Ground Water Rule	7/24/2012	Approved 8/11/2014
Lead and Copper Rule Short-Term Revisions and Clarifications	7/24/2012	Approved 8/11/2014
Revised Total Coliform Rule	2/25/2016	Approved 10/7/2019

Sanitary Surveys

Under 40 C.F.R. § 142.16, states must conduct sanitary surveys for CWSs no less frequently than every three (3) years, or five (5) years for outstanding performers. For NTNCWSs and TNCWSs, sanitary surveys must be conducted at least once every five (5) years.

Among CWSs, MSDH came close to the federal goal for completing sanitary surveys once every three (3) or five (5) years. As of September 30, 2021, sanitary surveys for 89.5 percent of CWSs were completed within their required schedule. For much of 2020, which was the end year for the measured sanitary survey period of CY 2018-20, MSDH was curtailed in the number of site visits by Regional Engineers due to the ongoing pandemic. Recent queries of the SDWIS/FED database showed that MSDH was conducting sanitary surveys at the systems that missed their scheduled 2020 surveys.

The MSDH's regional engineers are responsible for conducting sanitary surveys of PWSs in Mississippi. Under an approach more protective than federal requirements, all categories of PWSs are scheduled to have a sanitary survey completed every three (3) years. Regional engineers complete their assigned sanitary surveys according to the State's fiscal year schedule (July 1 to June 30). For CWSs and NTNCWSs, MSDH uses a Capacity Assessment Rating (CAR) to evaluate the technical, managerial, and financial capacity of systems during sanitary surveys. MSDH's CAR method is a transparent and efficient method to match systems with technical or financial assistance. MSDH defines significant deficiencies in each of the eight (8) required sanitary survey components. The most identified significant deficiencies among Mississippi public water systems included: inadequate internal cleaning/maintenance of storage tanks, lack of redundant mechanical components where treatment is required and improperly constructed wells.

In FY 2021 MSDH worked to address water system failures to complete corrective actions by issuing violations and forcing compliance via orders. This corrected a backlog of these "failure to address deficiencies" violations that were not reported to SDWIS/FED for years.

Enforcement

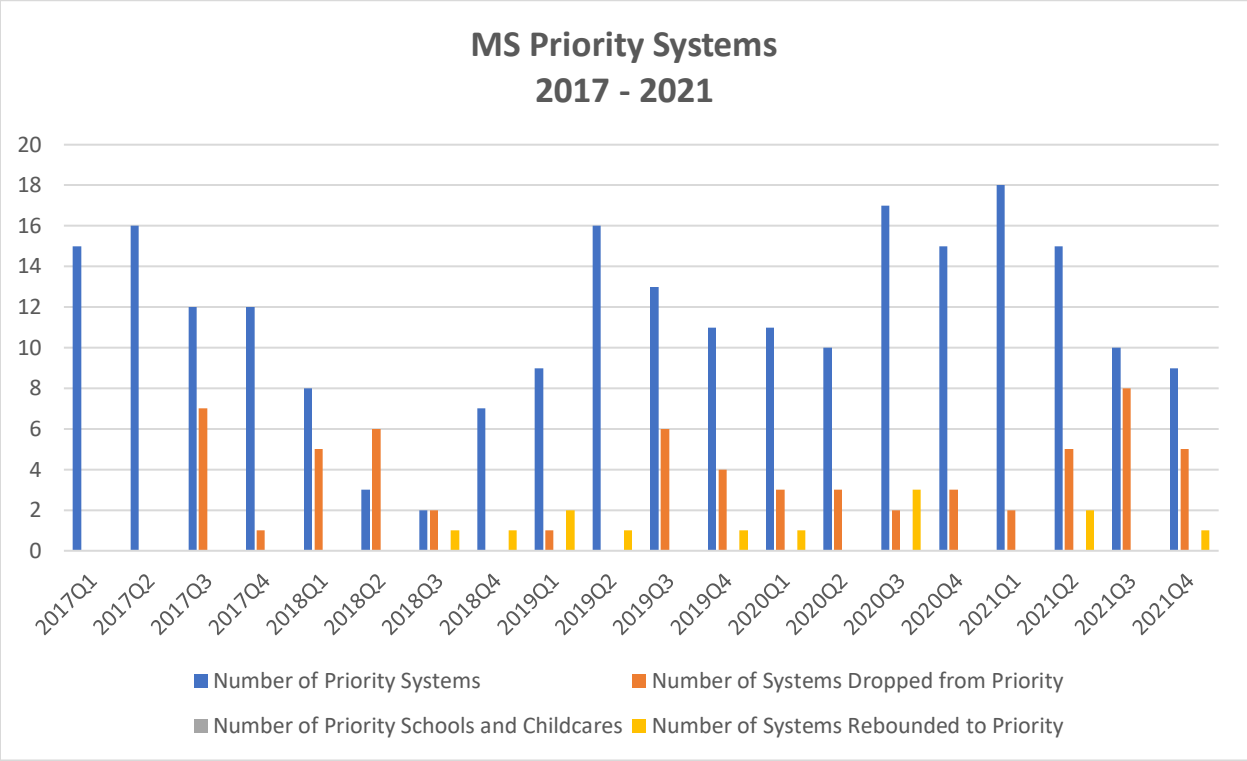
In FY 2021, the EPA Region 4 expanded its commitment to drinking water enforcement by creating a dedicated section whose responsibility was to oversee state drinking water enforcement and sanitary survey programs and to conduct federally lead inspections in support of the Drinking Water National Compliance Initiative. An Enforcement Review is an oversight approach used by EPA to conduct reviews of primacy agency drinking water enforcement programs. A sanitary survey evaluation determines whether a state's sanitary surveys are in alignment with state and federal regulations, policies and procedures. EPA has a fundamental oversight responsibility to evaluate the effectiveness of the primacy agency programs and identify opportunities for improvement.

The EPA Region 4 works closely with all eight (8) states to address non-compliant systems and reduce the number of priority systems. *The EPA Drinking Water Enforcement Response Policy (*ERP*)*[1] established six (6) months as the definition of "timely" standard for states to address with formal enforcement or return to compliance (RTC) systems that have an Enforcement Targeting Tool (ETT) score greater than or

[1] *Available at* https://www.epa.gov/sites/default/files/2015-09/documents/drinking-water-erp-2009.pdf

equal to 11 (priority systems). On a quarterly basis, the EPA evaluates the ETT and provides reports to the states. If needed, the EPA holds meetings with the State to discuss new systems on the ETT, challenges with addressing the ETT and any overall PWS enforcement program implementation issues. Figure 1 shows the number of priority systems, number of systems that dropped out of priority status, number of priority schools/childcare facilities, and the number of systems that rebounded to priority in the State for each calendar quarter over the past five (5) years and Table 3 shows a close up of the FY 2021 data.[2]

Figure 1: Mississippi Priority Systems (2017 -2021)



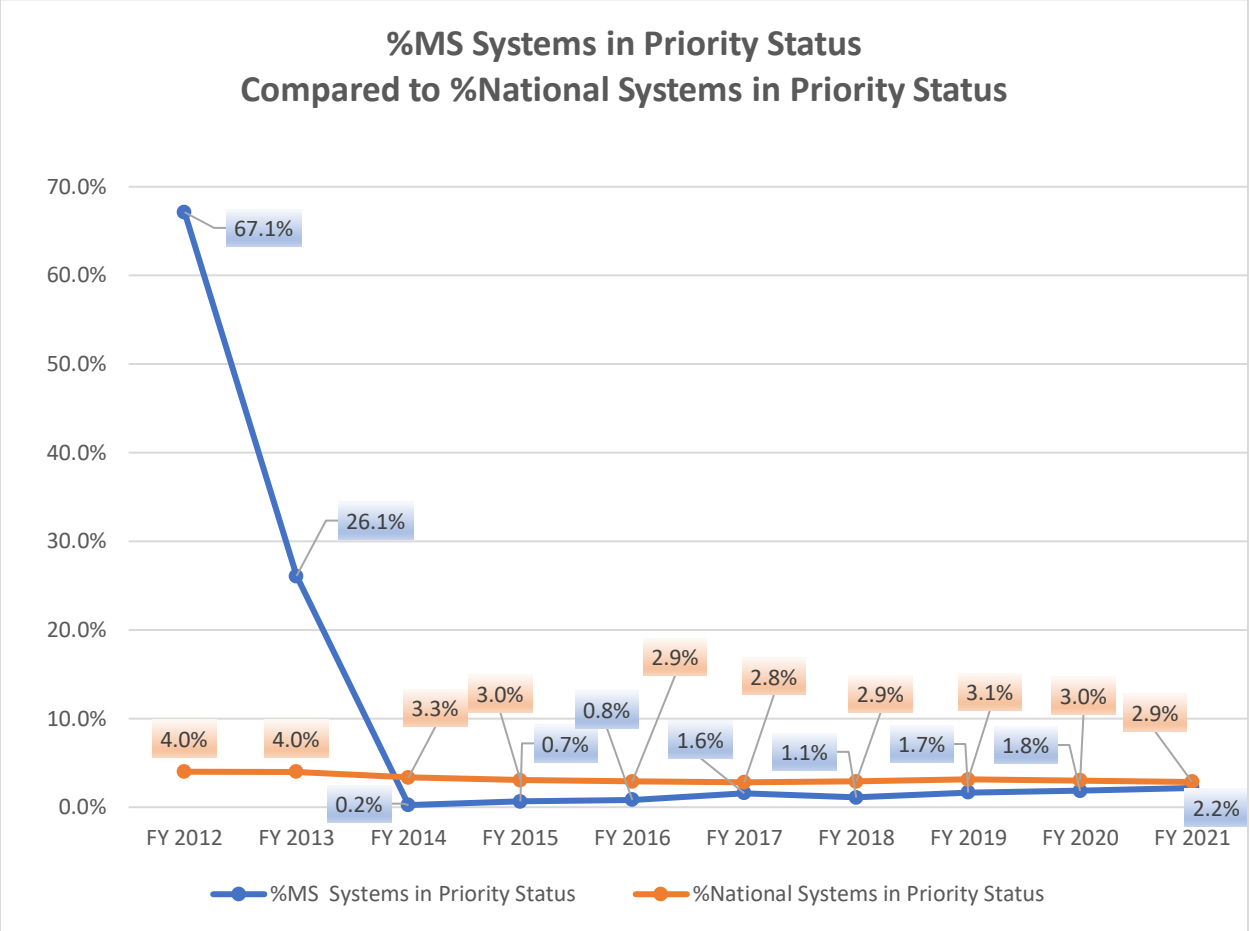
[2] *The ETT is generated each quarter using data from the quarterly SDWIS freeze. For the purposes of this annual review report, the January 2022 ETT – created using the December 2020 SDWIS freeze – was used to summarize the number of priority systems for FY 2021, Quarter 4. It should be noted, there is a data lag and as a result SDWIS data does not reflect "real time" violation data or enforcement response. Table 1 shows the specific priority system information by quarter.*

Table 3: FY 2021 ETT Priority Systems - MS

ETT List	Priority Systems	Percent of Systems in Priority Status	Additional Systems Added due to Formal Enf > 2 years old and not RTC	Systems added due to LCR TT Viols	Schools/Childcare with Score >0
October 2020	17	1.4%	0	0	1
January 2021	15	1.3%	0	0	1
April 2021	18	1.5%	3	0	0
July 2021	15	1.3%	0	0	0

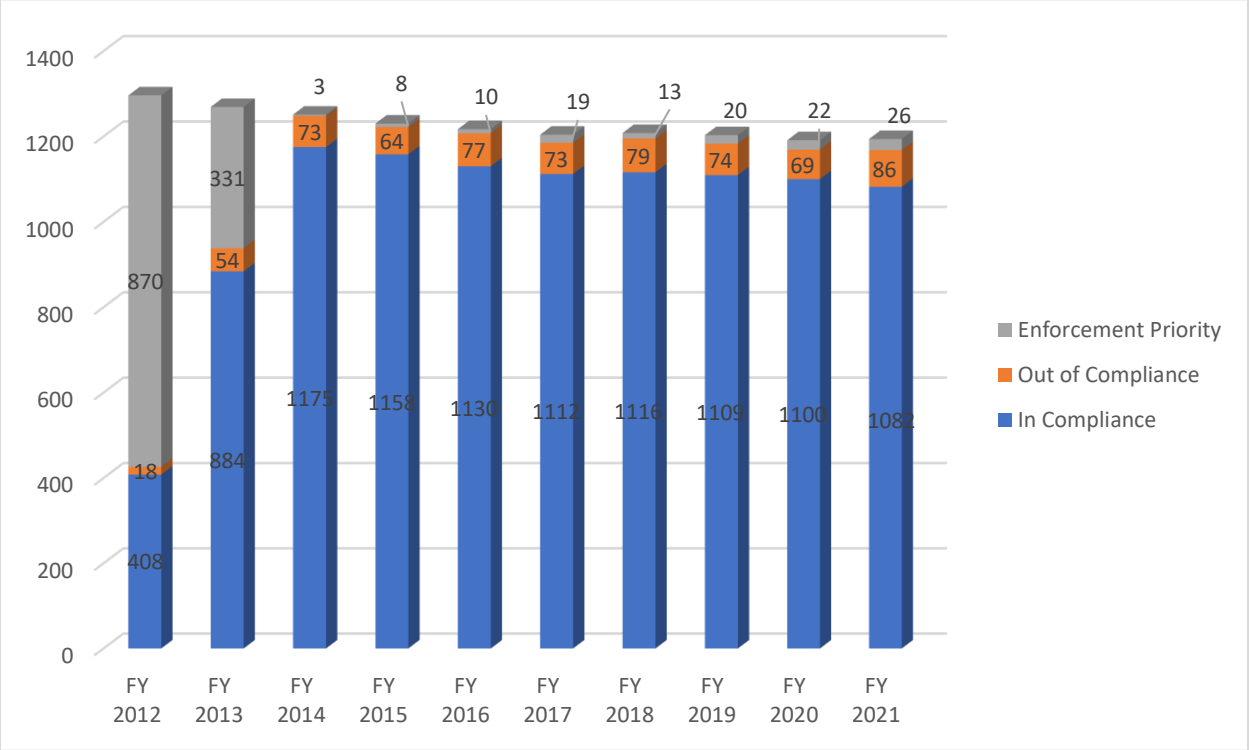
Figure 2 shows the percentage of Mississippi systems in priority status by fiscal year in comparison to the percentage of National systems in priority status for FY 2012 - FY 2021. In FY 2012 and FY 2013, the percentage of Mississippi systems in priority status was significantly greater than the National percentage of systems in priority status. This was precipitated by a laboratory certification issue with the Radionuclides rule which resulted in many violations to which the state had to work through to address over time. Those issues were addressed by FY 2014. Since FY 2014, the percentage of Mississippi systems in priority status has been below the National percentage of systems in priority status.

Figure 2: Percent of Mississippi Systems in Priority Status Compared to National Percentage



As evidenced by the information above and the information in Figure 3 below, since FY 2014, Mississippi has been relatively successful in addressing violations informally before a system becomes a priority system. In FY 2021, it is shown that Mississippi has also returned systems to compliance in a timely fashion as shown in the Table above regarding to having a very low number of systems in the "Additional Systems Added due to Formal Enforcement > 2 years old and not RTC" category and in the low number of "Rebounded" systems shown in Figure 1.

Figure 3: Mississippi Compliance Status



One (1) of the EPA's six (6) FY 2020 – 2023 National Compliance Initiatives (NCIs) focuses on drinking water compliance. The goal of the drinking water NCI is to use a broad range of compliance assurance approaches with CWSs, ranging from technical assistance to formal enforcement, to promote greater compliance with the SDWA. The EPA Region 4 will work with state primacy agencies to identify, prioritize, and address an agreed upon subset of CWSs with known, ongoing noncompliance. Additionally, the NCI will seek to identify and address risks at CWSs that may have gone unnoticed (e.g., noncompliance information is not reflected in the database of record). The NCI specific goals include: (1) 25 percent reduction in the number of CWSs out of compliance with health-based standards, as per the EPA's Strategic Plan; (2) 25 percent reduction in the number of CWSs in priority status (using the ETT) due to persistent noncompliance with monitoring and reporting requirements; (3) evaluate and address 50 percent of CWSs serving over 10,000 people to ensure compliance with NPDWRs.

DWSRF Program Integration: Capacity Development and Small System Support

The MSDH uses its CAR program and SDWA compliance to identify water systems in need of capacity assistance. A MSDH regional engineer assesses the performance of each CWS and NTNCWS during the annual compliance inspection or sanitary survey. The rating is determined using Capacity Assessment Forms, which consists of technical, managerial, and financial questions designed to identify tasks that a system must routinely accomplish to demonstrate its capacity to comply with current and proposed SDWA requirements. The rating scale ranges from "0" (minimum) to "5.0" (maximum). Using DWSRF set-aside funding, MSDH utilizes technical assistance contractors to provide free technical assistance to low-scoring systems and systems in long-term non-compliance. MSDH provides technical assistance organizations an annual list of systems in need of assistance. The contractors provide periodic reports to the MSDH regarding the benefits of their assistance efforts. MSDH has an Advisory Committee for the

Capacity Development Program that consists of governmental and water industry stakeholders. In the FY 2021 meeting, stakeholders and MSDH discussed the requirements of the America's Water Infrastructure Act (AWIA) as it pertained to the Capacity Development Program. Much discussion amongst the MSDH staff and the Advisory Committee centered on the integration of the concepts of asset management and the possibility of adding focus to water audits in the capacity development.

Most of the CWSs (95 percent) in Mississippi are classified as small systems (service populations less than or equal to 10,000). Many of these systems benefit from assistance provided by MSDH and its partner organizations. During FY 2021, activities undertaken in some of the assistance program areas are outlined below:

1. ***Comprehensive and Intermediate Technical Assistance*.** During FY 2021, the Mississippi State University - Extension Service (MSU-ES) provided comprehensive and intermediate assistance to 17 CWSs. Through a DWSRF-funded contract with MSDH, the MSU-ES provides one-on-one assistance to PWSs to improve their capacity ratings. CWSs are strongly encouraged to utilize available assistance to increase their ratings. MSDH ranks systems by their CAR and sends letters to the lowest performing systems. If a system refuses assistance, MSDH may take future compliance actions. The CWS receives targeted and specialized assistance based on the specific system's needs. Often, many CWSs need to make policy and management adjustments, which can take several months or longer to complete.

2. ***Peer Review Program*.** During FY 2021, the Peer Review team assisted 9 CWSs. This voluntary program pairs a selected group of water system operators with other operators to assist them in preparing for annual MSDH inspections. MSDH provides the MSU-ES a list of low-ranking systems. The MSU-ES sends a letter to the referred CWSs to determine their interest in participating in the Peer Review Program. If the system is interested, MSU-ES personnel coordinate a meeting with the Peer Review team and at least one system operator and a responsible official. During the meeting, all components of the capacity assessment are performed. After the meeting, the Peer Review team gives the reviewed system a report, which outlines issues and suggestions for improvement. The Peer Review Program primarily emphasizes technical components while providing limited managerial and financial assistance.

3. ***Hands-On Operator Training*.** During FY 2021, the Mississippi Rural Water Association (MsRWA) was unable to provide their hands-on operator training sessions due to the ongoing complications of the pandemic.

4. ***Board Management Training*.** During FY 2021, the MSU-ES administered nine (9) Board Management Training sessions to 109 board members and managers representing 103 PWSs. State law requires newly elected board members of private, non-profit water systems and officials of municipal water systems with a population of 10,000 or fewer to receive training in their duties and responsibilities. The MSU-ES coordinates with other selected training partners to deliver this training throughout the State. In FY 2021, MSDH deployed an online Board Management Training to reduce the number of untrained board members and PWS managers in FY 2021. MSDH anticipates that the number of untrained board members will decrease because of their ability to access the training they need.

5. ***Asset Management.*** In FY 2021, the MsRWA asset management training was not available. The lack of training sessions was due to the ongoing complications of the pandemic. MSDH hopes that

the asset management trainings can resume as soon as possible in FY 2022, to provide PWSs with the knowledge and understanding of what an asset management program can do to help them maintain their systems. Because of the emphasis placed on asset management in America's Water Infrastructure Act, the MSDH is making asset management a key metric in in Mississippi's Capacity Development Program and strategy for FY 2024 and following years. MSDH plans to use their Capacity Assessment program to encourage water systems that need to start or improve on asset management.

DWSRF Program Integration: Operator Certification

Mississippi's regulation governing the certification of operators of PWSs was promulgated under the authority of the Municipal and Domestic Water and Wastewater System Operator's Certification Act of 1986. This law made the certification for operator's mandatory after July 1, 1987. In Mississippi, certified operators are required for CWSs and NTNCWSs. The Bureau of Public Water Supply (the Bureau) of MSDH issues and renews operator certificates. Water systems are classified according to specific criteria included in Mississippi's regulation. Operator qualifications are commensurate with the complexity of operating these systems.

In their Public Water Supply Annual Report submitted by the PWS, the owner or responsible official of the system designates the operator in charge of the system. In 2021, certified operators were required at 1,027 CWSs and 70 NTNCWSs; however, 7 CWSs did not have a certified operator. If a system fails to hire a certified operator and/or provide their Public Water Supply Annual Report, the Bureau may issue an enforcement action to the water system.

The new Waterworks Operator Database is improving the certification and renewal process. Operators can track their training credits. Depending on experience, Mississippi operators are required to have up to 48 hours of continuing education in each 3-year certification period.

The resources dedicated to the Mississippi Operator Certification Program are utilized for certification and renewal materials such as certificates, testing booklets, and training sessions through contractual personnel. The Bureau and its engineering staff are used for continuing education units (CEU) and operator short course training on a routine basis. The Operator Certification Program is funded by the Operator Fee Program and the Public Water System Supervision Grant. The resources needed to implement the Operator Certification Program over the last year were sufficient.

The State continues to meet the public health objectives and nine (9) baseline standards under the provisions to the 1996 SDWA Amendments. The most recent Operator Certification program annual submittal was approved on August 18, 2021, by the EPA Region 4.

Rule Implementation

The EPA's FY 2018 - FY 2022 Strategic Plan[3] Goal 1, Objective 1.2, Strategic Measure (SM-2) is to reduce the number of CWSs out of compliance with health-based standards to 2,700 by September 30, 2022. The data source for the measure is the EPA's SDWIS Federal Data Warehouse, which contains compliance information about PWSs and their violations of the NPDWRs as reported to the EPA by the

[3] Available at https://www.epa.gov/planandbudget/fy-2018-2022-epa-strategic-plan

state primacy agencies. The baseline is the data that was available on October 1, 2017. At that time, the EPA Region 4 had 318 CWSs with health-based violations (HBVs); 23 CWSs were in Mississippi.

As of October 1, 2021, the EPA Region 4 had 195 CWSs with HBVs, and 32 of those CWSs were in Mississippi. The figures below show the number of CWSs with HBVs, the drinking water regulations violated, and the state-specific information. Figure 4 shows the number of CWSs with HBVs for each EPA Region 4 state. Figure 5 shows the number of CWSs with HBVs by Rule. Figure 6 shows the largest number of CWSs with HBVs in Mississippi was for the Ground Water Rule, followed by the Stage 2 Disinfectants and Disinfection Byproducts Rule.

Figure 4: CWSs with Health Based Violations – 3q2021

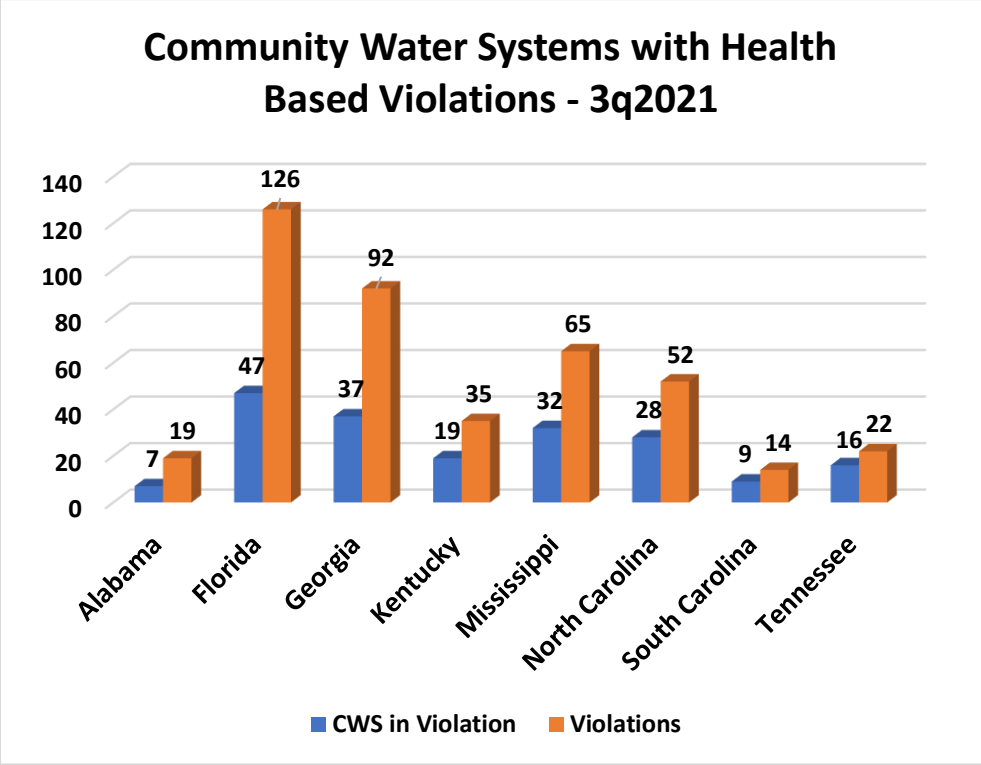
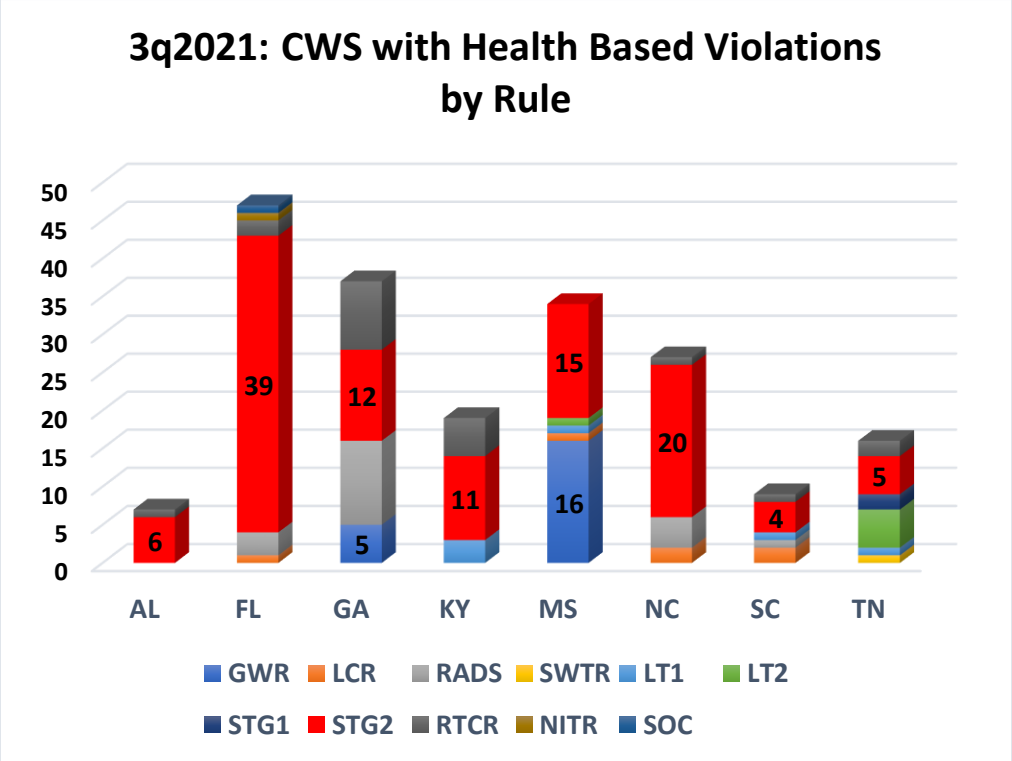


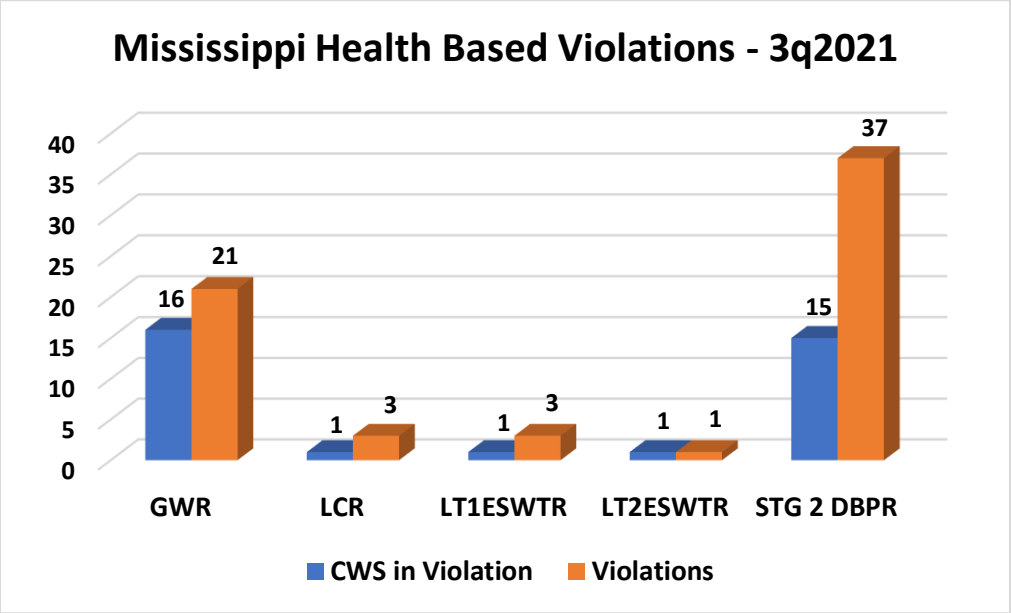
Figure 5: CWSs with Health Based Violations by Rule Type - 3q2021



Health-Based Violations Rule Abbreviation List

As	Arsenic Rule
GWR	Ground Water Rule
IOC	Inorganic Chemical Rule
LCR	Lead and Copper Rule
LT1	Long-Term 1 Enhanced Surface Water Treatment Rule
LT2	Long-Term 2 Enhanced Surface Water Treatment Rule
NITR	Nitrate and Nitrite Rule
RADS	Radionuclides Rule
RTCR	Revised Total Coliform Rule
SOC	Synthetic Organic Contaminants Rule
STG1	Stage 1 Disinfectants and Disinfection Byproducts Rule
STG2	Stage 2 Disinfectants and Disinfection Byproducts Rule
SWTR	Surface Water Treatment Rule
VOC	Volatile Organic Contaminants

Figure 6: Mississippi Health Based Violations - 3q2021



Rule Implementation: Lead and Copper Rule (LCR)

As part of the FY 2021 PWSS annual review process, EPA evaluated state primacy agency program implementation of two (2) aspects of the Lead and Copper Rule (LCR): Tiering Requirements for sampling and Corrosion Control Treatment (CCT). The EPA Region 4's approach to assessing LCR implementation included evaluating data reported to SDWIS/FED from the past year, using 3rd Quarter 2021 data, in addition to state responses to a 2022 questionnaire regarding state LCR implementation.

During the past year the state of Mississippi had 34 lead and copper action level exceedances (ALEs) (15 lead ALEs and 19 copper ALEs), three (3) treatment technique violations, and 34 monitoring violations of the Lead and Copper Rule (LCR).

For systems with an ALE and/or LCR violation(s) the state takes the following actions to work with the systems to lower lead levels in the distribution system: they notify samplers of the sample results within seven (7) days for results under the Action Level (AL) and within 48 hours for results above the AL. For small and medium sized systems, the system is required to provide a corrosion control treatment (CCT) recommendation within 180 days. The CCT recommendation is reviewed by MSDH before acceptance and then a timeline of next steps is decided. For those systems that need to employ CCT, the state uses the following approach to ensure compliance with this requirement: the state mandates that systems collect water quality parameters (WQPs) for systems with CCT, and during annual inspections and sanitary surveys, entry point data records are checked for WQP data. Additionally, systems with CCT are given parameters to reach to be deemed optimized under LCR.

Lastly, through CEU training, the MSDH staff stress the importance of using as many Tier 1 sites as possible in their sample site plan to work with systems to ensure that they are identifying and sampling at the highest tier sites. MSDH is in the process of updating the submission forms for LCR sampling plans and is pushing systems to have all Tier 1 sample site plans going forward. MSDH is updating its training

courses to include the necessity of Tier 1 site sampling for LCR and preparing strategies for future Lead and Copper Rule Revisions (LCRR) sampling implementation. MSDH is also adding a certification statement to the Confirmation of Notice for lead and copper sample results for the system to state that they used the highest tiered sites available for the system.

Rule Implementation: Public Notification (PN)

As part of the FY 2021 PWSS annual review process, EPA evaluated how states assign and report Public Notification violations. This additional focus was due to an Office of Inspector General report (No. 19-P-0318) recommending improvements to the EPA's oversight of PN Rule implementation. As a result, the EPA is continuing to look at each state primacy agency's approach to implementing the PN Rule, especially in situations where Tier 3 PN is required of water systems. The EPA Region 4's approach to assessing PN Rule implementation included evaluating violation data reported to SDWIS/FED covering FY 2019 through FY 2021, as well as state responses to a questionnaire regarding the state's approach for identifying, issuing, tracking, and reviewing violations and certifications for Tier 3 PN, and how this approach compares to how Tier 1 and 2 notifications are managed.

During the last three (3) years, the state had 14 Tier 2 violations and 23 Tier 3 violations of the PN Rule. The State uses reports from the Compliance Decision Support in SDWIS/STATE to identify PN Violations. Additionally, rule managers track PN violations using SDWIS/STATE and its alert features or by spreadsheet. Mississippi reviews all PNs sent to customers based on the underlying violation. A water system is credited with completion of the PN requirements once a copy of both the PN and the PN Certification is received. The State also allows the use of the CCR to meet Tier 3 PN requirements. Each CCR is reviewed for PN elements and to ensure it was issued within the required timeframe. The State maintains PNs, certifications and supporting paperwork in an internal database.

Data Management and Reliability

State Data Management - Main Database and Data Transfer Software

MSDH uses SDWIS/STATE to manage PWSS Program information and SDWIS/FedRep for reporting data to the EPA. MSDH uses a version of SDWIS/STATE (version 3.33) which ensures reporting on all drinking water rules but needs to be upgraded to version 3.34 to assure that SDWIS/STATE works properly in MSDH's computing environment. The Drinking Water Program reported that the upgrades are in progress and that another product, SDWIS Bridge has been installed. It enables compliance determination and reporting associated with the more recent drinking water regulations such as the GWR and the RTCR.

Data Management and Reliability & Compliance Data Management

Operational responsibility for SDWIS/STATE resides in the MSDH Information Technology Department. The Drinking Water Program reported that the IT department became more flexible in allowing increased control for the Drinking Water Program to upgrade SDWIS/STATE. SDWIS/STATE maintenance and custom designed add-on report applications are done by an off-site contract employee, who is also the SDWIS/STATE Administrator. The contractor also participates in EPA/Association of Safe Drinking Water Administrators data management workgroups and provides input to the ongoing SDWIS Modernization project on behalf of MSDH.

MSDH determines rule compliance using SDWIS/STATE's Compliance Decision Support module and internal spreadsheets for select rules. The MSDH's compliance officers are responsible for the data management and compliance determination work for all drinking water rules.

MSDH receives sample data from the MSDH Public Health Laboratory (MPHL) and commercial laboratories by a combination of electronic data files or paper submissions. Paper submissions are manually entered into SDWIS/STATE and any electronic data flows are handled with the MSDH's customized SDWIS/STATE add-on applications. In Mississippi, the MPHL provides most laboratory analytical services and support to the MSDH Bureau and the PWSS monitoring and compliance program. Outside analytical laboratories handle a small portion of the drinking water analytical workload in the state.

Data Production to SDWIS/FED

MSDH was on time with its data submissions to SDWIS/FED in FY 2021. Further analysis showed that MSDH was on time with reporting valid violations to SDWIS/FED and that most sanitary surveys were recorded to SDWIS/FED in a timely manner.

Data Availability to Regulated Community and Public

MSDH uses the Drinking Water Watch application for public web display of drinking water system information including sample analytical data, violations and enforcement information and other pertinent information about a water system.

Laboratory Certification

Pursuant to 40 C.F.R. § 142.10(b)(3)(i), the State is required to establish and maintain a state program for the certification of laboratories conducting analytical measurements of drinking water contaminants pursuant to the requirements of the State primary drinking water regulations. To receive and retain primacy under the requirements of 40 C.F.R. § 142.10(b)(4), the State must have laboratory facilities available and capable of performing analytical measurements for all contaminants specified in the State primary drinking water regulations. MSDH uses the MPHL as the Principal State Laboratory and must be certified by the EPA.

Principal State Laboratory (PSL): The laboratory is ***Certified*** through August 29, 2022. The laboratory is Provisionally Certified for Carbofuran, Oxamyl and Glyphosate, as the required parts and/or reagents are unavailable in 2021, for the analysis of the three (3) organic analytes. The certification status of each area of responsibility is listed in Table 4, below.

Table 4: State Primacy Laboratory Certification Status

Primacy Laboratory Name and Location	Laboratory Type	Certification Entity					
		Chemistry	Microbiology	Radiochemistry	Asbestos	Dioxin	PCBs
MPHL, Jackson, MS	State (PSL)	X	X	X			
Eurofins Eaton/ Monrovia, CA	Commercial			X		X	
Eurofins Eaton/ South Bend, IN	Commercial	X		X			
EMSL Analytical, Inc.	Commercial				X		
Texas State Dept of Health Services							X

Laboratory Certification Program: The program is deemed ***Effective*** through August 29, 2022. The number of contract laboratories assessed is listed in Table 5 and 6. The number of certification officers performing the audits and tracking drinking water proficiency tests within the program is listed in Table 7.

Table 5: State Laboratory Certification Program

Number of Laboratories Certified for Drinking Water Analyses In-State and Out of State (*)				
Chemistry	**Microbiology**	**Radiochemistry**	**Cryptosporidium**	**Asbestos**
2	5	0	0	0

Table 6: Laboratories Certified through Reciprocity and Other Agreements by the State

Number of Laboratories Certified for Drinking Water Analyses In-State and Out of State (*)				
Chemistry	**Microbiology**	**Radiochemistry**	**Cryptosporidium**	**Asbestos**
11	4	0	0	3

Table 7: Number of State Certified Auditors

Area of Responsibility	Number of Auditors Certification Officers for the Areas of Responsibility
Chemistry	4
Microbiology	2
Radiochemistry	0
Cryptosporidium	0
Asbestos	0

Emergency Response Plan

The State of Mississippi has an emergency response plan (ERP) that was last updated in 1976. Based upon the date of the most recent ERP, the EPA Region 4 will work with MSDH in updating their ERP.